

**REMARKS**

In the Office Action<sup>1</sup>, the Examiner rejected claims 1 and 3-37 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,169,984 to Bogdan ("*Bogdan*").

Claims 1 and 3-37 are pending in the application.

Applicant respectfully traverses the rejection of claims 1 and 3-37 under 35 U.S.C. § 102(b) as anticipated by the *Bogdan*. In order to properly establish that *Bogdan* anticipates Applicant's claims under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Claim 1 recites a computer program product to execute a method for navigating user interface elements on a display screen, the interface elements being arranged in order into user interface element groups having assigned group identifier characters and the method including:

detecting a user navigation input comprising one of a forward user navigation input or a backward user navigation input, a forward user navigation input comprising a forward modifier key press combined with a key press of a group identifier character, and a backward user navigation input

---

<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

comprising a backward modifier key press combined with a key press of a group identifier character; [and]

identifying a selected group of user interface elements associated with the first or second group identifier character;

(emphasis added). *Bogdan* does not disclose at least these elements of claim 1.

While *Bogdan* discloses grouping user interface elements into containers (col. 5, lines 27-35), *Bogdan* does not disclose that the components containing groups of user interface elements have assigned group identifier characters. A system such as the one illustrated in Figure 2 of *Bogdan*, where containers 210, 230, 240, and 250 do not have associated group identifier characters, would be incapable of identifying a selected group of user interface elements associated with a group identifier character.

Therefore, *Bogdan* does not disclose “the interface elements being arranged in order into user interface element groups having assigned group identifier characters” and “identifying a selected group of user interface elements associated with the first or second group identifier character,” as recited in claim 1.

Furthermore, *Bogdan* discloses defining the scope of a search by pressing the ALT key. (Col. 6, lines 30-39). *Bogdan* then teaches searching within the defined scope for a first character. (Fig. 4, reference 421; col. 7, lines 27-44). However, *Bogdan* does not disclose forward or backward navigation input, nor does *Bogdan* disclose combining a forward or backward modifier key press with a group identifier character key press. Therefore, *Bogdan* does not disclose “a forward user navigation input comprising a forward modifier key press combined with a key press of a group identifier character, and a backward user navigation input comprising a backward

modifier key press combined with a key press of a group identifier character," as recited in claim 1.

*Bogdan* fails to teach at least the above elements and, accordingly, cannot anticipate claim 1. Claim 1 is therefore allowable. Independent claims 9, 13, 18, 23, and 27, while of different scope, recite elements similar to those of claim 1 and are thus allowable over *Bogdan* for at least the same reasons discussed above with respect to claim 1. Claims 3-8 and 32 depend from claim 1, claims 10-12 and 33 depend from claim 9, claims 14-17 and 34 depend from claim 13, claims 19-22 and 35 depend from claim 18, claims 24-26 and 36 depend from claim 23, and claims 28-31 and 37 depend from claim 27. These dependent claims therefore require all of the elements recited in their respective base claims. Accordingly, claims 3-8, 10-12, 14-17, 19-22, 24-26, and 28-37 are not anticipated by *Bogdan* at least due to their dependence from claims 1, 9, 13, 18, 23, and 27.


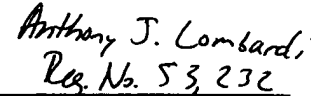
In view of the foregoing, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

Dated: October 14, 2008

By:    
for Jeffrey A. Berkowitz  
Reg. No. 36,743  
Anthony J. Lombardi  
Reg. No. 53,232